

In the matter of proposal RM-10782, it is my opinion that this proposal has strong merits and unfortunately, also has flaws within its position.

First, I agree with the Copollas that the amateur service has been burdened by the requirement of morse proficiency testing. Clearly a large percentage of the amateur service meets the minimal requirement for morse proficiency and never uses this mode of communication. There are many qualified and competent amateur operators that are excellent electronics engineers and technicians that have not utilized morse except for their initial testing. In reality, it's easy to draw the conclusion that the requirement is arcane and should be struck from the regulations. I agree that for most amateurs, morse testing is unnecessary and in some cases, can be detrimental to the hobby by excluding otherwise qualified applicants.

The Copollas make a seemingly compelling argument that digital modes such as "PSK31, JT44 and digital voice" have replaced CW for weak-signal modes of communication. This is not necessarily the case. In highly experimental or specialized modes such as EME, meteor scatter or even amateur satellite uses, digital modes are difficult to employ because of the very brief window of communication, rapidly changing or deteriorating link conditions or digital modes unnecessarily complicate operation. Real world operations do not support any notion that CW is arcane and will be completely replaced by digital modes.

For daily communication purposes however, CW is effectively a niche mode that will continue to be used as long as it is permitted within Part 97 rules. However, my concern is that as the natural attrition of amateur operators occurs, due to loss of interest within the hobby or the passing of operators, the pool of proficient CW operators will decline. It is my belief that if one purpose of the Amateur Service is to provide a pool of "trained operators, technicians and electronics experts", some level of morse proficiency should be encouraged by the Commission. Furthermore, morse code is still employed in many commercial applications such as identifications and back-up satellite transponder data systems. At no-cost to the tax payer, a trained pool of technicians that easily understands the mode can be kept.

Therefore, I ask the Commission to strongly consider RM-10782 with one exception. The Commission should strive to encourage morse proficiency through testing for one license class or endorsement. This would solve many problems with amateur service recruitment, yet retain a qualified pool of proficient CW operators.